UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MICHAEL L. COHEN and VANJA BAROS,

Defendants.

Case No. 17-CV-430 (NGG)(LB)

Date of Service: June 27, 2017

NOTICE OF DEFENDANT MICHAEL L. COHEN'S MOTION TO DISMISS THE AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Request for Judicial Notice, and Declaration of Kayvan B. Sadeghi and exhibits thereto, Defendant Michael L. Cohen, by his attorneys, will move this Court before the Honorable Nicholas G. Garaufis, at the Theodore Roosevelt United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, for an order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Amended Complaint in its entirety, with prejudice, together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York June 27, 2017 MORRISON & FOERSTER LLP

Julic 27, 2017

By: /s/ Ronald G. White

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